

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN DIVISION**

RAYMOND SKELTON,

Plaintiff

vs.

JOHN DOE DIETICIAN, *et al.*,

Defendants.

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Case No.: 19-cv-18597

Hon. Renée Marie Bumb

PLAINTIFF’S RESPONSE TO ORDER TO SHOW CAUSE (ECF NO. 23)

NOW COMES Plaintiff, RAYMOND SKELTON, by and through Counsel, Solomon M. Radner, and for his response to the Court’s Order to Show Cause (ECF No. 23), states as follows:

Undersigned counsel for Plaintiff accepted employment at a new law firm on November 1, 2020, the same week the Order granting Defendants New Jersey Department of Corrections, Marcus O. Hicks, and John Powell’s Motion to Dismiss, and allowing Plaintiff an opportunity to file an amended complaint within 45 days of October 30, 2020.

Unfortunately, due to the change in employment, the 45-day deadline to file an amended complaint was not properly calendared at undersigned’s new law firm, and the deadline was missed. This was a clerical oversight and undersigned apologizes for same.

It has become clear over the past several months that remaining as counsel for the Plaintiff in this case and providing this case the attention it requires, will unfortunately be impossible due to undersigned counsel's obligations associated with this new employment.

As such, undersigned counsel has secured new representation for Plaintiff in this matter, and Plaintiff respectfully requests this Court to allow an additional 30 days to file said substitution of counsel and an amended complaint.

Respectfully Submitted,

JOHNSON LAW, PLLC

By: /s/ Solomon M. Radner
SOLOMON M. RADNER, ESQ.
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Dated: June 28, 2021

PROOF OF SERVICE

On June 28, 2021, the undersigned served the foregoing document on all known parties of record by e-filing it on this Court's CM/ECF e-filing system which will send notice to counsel of record for all represented parties.

/s/ Solomon M. Radner